

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

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JOHN DOE,	:	
	:	
Plaintiff,	:	
	:	
v.	:	Civil Case No. 1:23-cv-114
	:	
WAKE FOREST UNIVERSITY,	:	
	:	
Defendant.	:	
	:	

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**JOINT STIPULATION TO SEAL EXHIBITS  
AND ATTACH ADDITIONAL DOCUMENTS TO MOTION TO COMPEL**

Defendant Wake Forest University (the “University”), with the consent of Plaintiff John Doe (“Plaintiff”), submits this joint stipulation to seal Exhibits C-G to the University’s Memorandum (“Memorandum”) in Support of its Motion to Compel [ECF No. 52] and to attach additional replacement exhibits to the Memorandum.

The parties agreed to proceed under pseudonyms in this matter given the sensitive nature of the allegations and to remove information protected by the Family Educational Rights and Privacy Act (“FERPA”). It was recently determined that certain student information protected by FERPA and by agreement of the parties was inadvertently published in Exhibits C-G [ECF Nos. 52-3 through 52-7]. By agreement of the parties, and at the instruction of the Clerk’s office, the University respectfully requests to seal ECF Nos. 52-3, 52-4, 52-5, 52-6, and 52-7, and submits additional attachments to the main document [ECF No. 52] as replacement.

Counsel for the University has conferred with counsel for the Plaintiff, and Plaintiff joins in this request.

Dated: June 28, 2023

/s/ Douglas A. Sampson

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